

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

In the Matter of the Search of
*(Briefly describe the property to be searched
 or identify the person by name and address)*
 2000 Chevrolet Silverado pickup truck
 VIN: 1GCEC14W3YZ117399

Case No.

2:18mj315

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

See Attachment A

located in the Southern District of Ohio, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
 18 U.S.C. 2113
 [and others in affidavit]

Offense Description
 Bank Robbery and Incidental crimes
 [See Affidavit]

The application is based on these facts:

See attached Affidavit

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Robert G. Moledor, Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date:

April 6, 2018

City and state:

Columbus, OH


 Judge's signature

 Kimberly A. Iron, US Magistrate Judge
 Printed name and title

AFFIDAVIT

I, Robert G. Moledor, a Task Force Officer with the Federal Bureau of Investigation (FBI), Cincinnati Division, being duly sworn, depose and state as follows:

1. I have been employed as a police officer of the Columbus Division of Police for 28 years, and am currently assigned to the Cincinnati Division's Columbus Resident Agency. I have been assigned in an investigative capacity as a Detective and Task Force Officer (TFO) for 20 years. In my current assignment I investigate gang activity, criminal enterprises, narcotics, fugitives, robberies and other violent crimes. I have worked as a law enforcement officer for a total of 33 years and as such I have attended the Central Texas Regional Police Academy, the United States Army Criminal Investigations course as well as the Columbus Police Academy and have been awarded certificates from the Texas Commission on Law Enforcement Officer Standards and Education (TCLEOSE) and Ohio Peace Officer Training Commission (OPOTC), as well as numerous hours of law enforcement training. While employed by the FBI, I have assisted in the investigation of federal criminal violations related to numerous violent incident crimes including bank robbery. I have gained experience through FBI in-service training and everyday work related to conducting these types of investigations.

2. As a Task Force Officer with the FBI, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. I am investigating the activities of JABRAELYN A. BUNN of 1120 Ninth Street NW, Canton, Ohio. As will be shown below, there is probable cause to believe that BUNN was involved in the robbery of PNC Bank, 438 Lake Avenue NE, Massillon, Ohio, in violation of Title 18, United States Code, Section 2113. I am submitting this affidavit in support of a search warrant authorizing a search of Bunn's 2000 Chevrolet Silverado truck, VIN

1GCEC14W3YZ117399, bearing Ohio license HDR4655 (the "Vehicle"). The vehicle is secured at the Columbus Police Impound Lot located at 2700 Impound Lot Road, Columbus, Ohio. The vehicle is more particularly described in Attachment A, for the items specified in Attachment B hereto, which items constitute instrumentalities, fruits, and evidence of the foregoing violation. I am requesting authority to search the entire vehicle for items specified in Attachment B, and to seize all items listed in Attachment B as instrumentalities, fruits, and evidence of the crime.

4. The statements in this affidavit are based in part on information provided by victims as well as observations by Affiant and other law enforcement officers. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts necessary to establish probable cause to believe that evidence, fruits, and instrumentalities of a violation of Title 18, United States Code, Section 2113, are presently located within the vehicle in the possession of the Columbus Police.

STATUTORY AUTHORITY

5. This investigation concerns alleged violations of Title 18, United States Code, Section 2113 relating to the robbery of PNC Bank, a federal insured institution. Title 18, United States Code, Section 2113c prohibits a person from receiving, possessing, concealing, storing, bartering, selling, or disposing of any property or money or other thing of value which has been taken or stolen from a bank, credit union, or savings and loan association.

BACKGROUND OF THE INVESTIGATION

6. On 09/14/2017 at 11:10 am, a lone black male entered PNC Bank,

438 Lake Avenue NE, Massillon, Ohio, a federally insured institution, and approached the victim teller. The subject stated he wished to get some money at which time the teller requested his debit and identification card. The subject stated he had neither but did have a gun. Subject brandished a handgun and ordered all parties to put their hands in the air. He then threw his back pack to the teller and ordered her to fill it with money. He demanded that she not provide him bait money or marked bills.

7. The subject moved on to a second teller and demanded the same. While she was filling the bag, the subject pointed his weapon at the Mortgage Officer who was in his office and on the phone. The subject ordered the employee off of the phone. He continued to waive his weapon around the bank while the second teller was filling the bag. After retrieving the bag from the second teller, the subject grabbed the bank's candy from the teller counter then exited the front door of the bank and walked northbound.

8. The subject was last seen entering a getaway vehicle driven by a second unknown subject. Two witnesses observed the subject enter a white short bed pick-up truck which was parked on Gail Street NE at the rear of 1413 Amherst Avenue NE, Massillon, Ohio (March's grocery store). The two subjects drove off and were last seen westbound on Gail Street NE.

9. On 09/17/2017, SA Andrew J. Hayden was contacted by the Columbus Police Officer Luke A. Velie advising they had found the bank robbery getaway truck abandoned near an apartment building on the north side of Columbus, Ohio. The located vehicle was a 2000 Chevrolet Silverado pickup truck, white in color, VIN 1GCEC14W3YZ117399, bearing Ohio license HDR4655. The truck had a broken passenger door handle rendering the passenger door inoperable from the outside of the truck. The vehicle was registered to JABRAELYN BUNN of 1120 Ninth Street NW, Canton, Ohio. A subject meeting the description of the bank robber

appeared to have abandoned the truck after which he car jacked a Toyota Corolla from a nearby apartment resident.

10. Later on 09/17/2017, four subjects were located by law enforcement driving the stolen Toyota in West Milford, WV. The vehicle refused to stop for the police after which one subject (later identified as BRIAN ZIRO) fired rounds from that moving vehicle at responding law enforcement. The vehicle crashed into a ditch and all four subjects fled on foot. At one point, ZIRO separated himself from the crowd and was spotted later by law enforcement while he walked across a nearby bridge. ZIRO pulled his weapon on the officers at which time he was shot and killed by the police.

11. The driver of the Toyota Corolla was identified as JABRAELYN A. BUNN, DOB 09/24/1996, SSN 302-98-7763, home address 1120 9th Street NW, Canton, Ohio.

12. The deceased (identified as the bank robber) was positively identified through DNA as BRIAN ZIRO, black male, 5'9" tall, 185 pounds, DOB 08/28/1996, SSN xxx-xx-5809, last known address 1074 Scott Street, Columbus, Ohio.

13. The remaining two passenger were identified as JACOB M. HUNTER, white male, DOB 08/01/1999, SSN xxx-xx-9936, home address 1120 9th Street NW, Canton, Ohio , and JADA N. HILLTON, black female, DOB 11/18/1998, SSN xxx-xx-9068, last known address 1120 9th Street NW, Canton, Ohio.

14. JADA HILLTON was previously interviewed by the FBI in West Virginia following the aforementioned car chase and shooting. At that time, HILLTON indicated she and BUNN didn't wake up on 09/14/2017 (day of the bank robbery) until 1:00 pm.

15. On 12/05/2017, HILLTON was located in Canton, Ohio and interviewed by SA Hayden. HILLTON admitted to lying to the West Virginia authorities earlier in an effort to protect herself and BUNN. HILLTON stated she and BUNN actually woke up between 9:00 am and 10:00 am on 09/14/2017. BUNN left the house at that time with ZIRO but wouldn't tell HILLTON where he was going. BUNN returned home with ZIRO between 11:30 am and 12:00 pm on the same day.

16. A local search warrant was executed on T-Mobile seeking cell site tower data and call records for the cellular phones utilized by BUNN and HILLTON. The FBI's Cellular Analysis Survey Team (CAST) reviewed the call records and cell site data provided by T-Mobile in response to the search warrant. The results indicated BUNN's phone was in the near vicinity of the victim bank and utilizing nearby cellular towers during the commission of the robbery by ZIRO on 09/14/2017.


17. Two witnesses reported a male meeting the description of ZIRO running from the area of the bank and approaching an older model white Chevrolet pickup truck parked in the rear of the Marc's grocery store. The male ran up to the passenger door (which had a broken handle) and pounded on the window to be let in. Someone in the truck let the male into the truck and both sped away.

CONCLUSION

18. Based on the aforementioned factual information, your affiant respectfully submits that there is probable cause to believe BUNN drove his white 2000 Chevrolet Silverado to transport ZIRO to and from the PNC Bank on 09/14/2017 for the purposes of a bank robbery in violation of Title 18 U.S.C. § 2113. Lastly, there is probable cause to believe that evidence of

the commission of criminal offenses, namely, violations of 18 U.S.C. §§ 2113, is located in the truck described above, and this evidence, listed in Attachment B of this affidavit, which is incorporated herein by reference, is contraband, the fruits of crime, or things otherwise criminally possessed, or property which is or has been used as the means of committing the foregoing offenses.

28. Your affiant, therefore, respectfully requests that the attached warrant be issued authorizing the search and seizure of the items listed in Attachment B.


Robert G Moledor
Task Force Officer
Federal Bureau of Investigation

Sworn and subscribed before me this 6th day of April, 2018.


Kimberly A. Jolson
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

**2000 Chevrolet Silverado pickup truck
VIN: 1GCEC14W3YZ117399**

Captioned 2000 Chevrolet Silverado is white in color and may have a broken exterior passenger door handle. The truck was last bearing Ohio license # HDR4655.

ATTACHMENT B

LIST OF ITEMS TO BE SEIZED

1. Any and all notes, documents, records, or correspondence, in any format and medium (including, but not limited to, envelopes, letters, papers, e-mail messages, chat logs and electronic messages, and handwritten notes) pertaining to any financial institution.
2. Any and all documentation detailing maps or directions to or from any financial institution.
3. Any and all documentation pertaining to BRIAN ZIRO, JABRAELYN BUNN, JADA HILLTON or JACOB HUNTER.
4. Any and all documentation relating to the ownership of the Chevrolet Silverado being searched.
5. Any pieces of candy or candy wrappers.